

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, <i>et al.</i> ,)
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v.)
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JETBLUE AIRWAYS CORPORATION and)
SPIRIT AIRLINES, INC.,)
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	Civil Action No. 1:23-cv-10511-WGY

**DEFENDANTS' SUPPLEMENTAL MOTION TO SEAL CERTAIN TRIAL EXHIBITS
AND FOR LIMITED CLOSING OF COURTOOM TO PUBLIC DURING TRIAL**

Pursuant to the Joint Confidentiality Protocol for Party Documents (Dkt. No. 166) (the “Joint Confidentiality Protocol”),¹ Defendants JetBlue Airways Corporation and Spirit Airlines, Inc. hereby move this Court for an Order to seal in their entirety certain highly sensitive trial exhibits relating to Defendants’ future, post-merger network plans (the “Combined Network Plan Documents”). The specific documents to be sealed and the reasons supporting the sealing are articulated in Defendants’ Memorandum of Law in Support and the Declaration of Laura E. Rodgers, which are being filed contemporaneously herewith. In addition, due to the highly sensitive nature of these documents and the future plans contained therein, Defendants respectfully request that the Court order that any witness examination likely to elicit the contents of the Combined Network Plan Documents be held in a closed session. Finally, Defendants also request that counsel be prohibited from publicly disclosing the contents of the Combined Network Plan

¹ Approved by the Court via electronic order on September 12, 2023 (Dkt. No. 187).

Documents at trial, including during opening or closing arguments, except with respect to the limited, high-level information that was already made public in the parties' pre-trial briefs.

Dated: October 25, 2023

Respectfully submitted,

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that on multiple occasions, Defendants met and conferred in good faith with counsel for Plaintiffs to resolve issues related to the confidentiality of the parties' trial exhibits contemplated under the Joint Confidentiality Protocol.

/s/ Leila R. Siddiky
Leila R. Siddiky

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system on October 25, 2023, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Leila R. Siddiky
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